

# **Exhibit A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

REGINA WINTERS and STEVEN WINTERS, for )  
themselves and as next friend of their minor )  
children, RESHYLA WINTERS and SAVAYLA )  
WINTERS; and JESSIE EVANS, )

Plaintiffs,

V.

THE CITY OF CHICAGO; Chicago police officers JUAN L. PEREZ (star #19056); MATTHEW SANCHEZ (#10159); RICCARDO PEREZ GUZMAN (#18960); BRIAN BONE (#118378); JONATHAN DIAZ (#116858); ANDREW RANGEL (#121590); RIGOBERTO FINE (#117547); SGT. RICKY RIVERA (#2101); CHRISTIAN SZCZUR (#18774); PIERRE TYLER (#10228); and Other CURRENTLY UNKNOWN CHICAGO POLICE OFFICERS,

Defendants.

Case No. 21-cv-04135

District Judge Matthew F. Kennelly

Magistrate Judge Beth W. Jantz

# Jury Demanded

## **OFFER OF JUDGMENT**

DEFENDANT CITY OF CHICAGO (hereinafter, “DEFENDANT CITY”), CHICAGO POLICE OFFICERS JUAN L. PEREZ (#19056), MATTHEW SANCHEZ (#10159), RICCARDO PEREZ GUZMAN (#18960), BRIAN BONE (#118378), JONATHAN DIAZ (#116858), ANDREW RANGEL (#121590), RIGOBERTO FINE (#117547), SGT. RICKY RIVERA (#2101), CHRISTIAN SZCZUR (#18774), and PIERRE TYLER (#10228), by their undersigned attorneys, make the following offer of judgment to Plaintiffs REGINA WINTERS and STEVEN WINTERS, individually and as next friend of their minor children, RESHYLA WINTERS and SAVAYLA WINTERS, and JESSIE EVANS, pursuant to Federal Rule of Civil Procedure 68:

1. Defendants offer to allow judgment to be taken against them and in favor of Plaintiffs as follows:

- a. In favor of Plaintiff, REGINA WINTERS, in the amount of ONE HUNDRED AND TWENTY-NINE THOUSAND AND NINE HUNDRED AND NINTY-NINE DOLLARS AND NO/100 CENTS (\$129,999.00);
- b. In favor of Plaintiff, STEVEN WINTERS, in the amount of SEVENTY THOUSAND DOLLARS AND NO/100 CENTS (\$70,000.00);
- c. In favor of Plaintiff, RESHYLA WINTERS, in the amount of FIFTY THOUSAND DOLLARS AND NO/100 CENTS (\$50,000.00);
- d. In favor of Plaintiff, SAVAYLA WINTERS, in the amount of FIFTY THOUSAND DOLLARS AND NO/100 CENTS (\$50,000.00);
- e. In favor of Plaintiff, JESSE EVANS, in the amount of ONE DOLLAR AND NO/100 CENTS (\$1.00);
- f. Plus reasonable attorneys' fees and costs as to Plaintiffs REGINA WINTERS, STEVEN WINTERS, RESHYLA WINTERS, SAVAYLA WINTERS, and JESSIE EVANS accrued in relation to this case through the date of service of this officer of judgment (June 17, 2022), in an amount to be determined by the Court, not to exceed ONE HUNDRED AND FIFTY THOUSAND DOLLARS AND NO/100 CENTS (\$150,000.00).

2. This offer of judgment is conditioned upon each plaintiff accepting the offer of judgment as to each defendant. Acceptance of this offer of judgment by fewer than all plaintiffs against fewer than all defendants shall be deemed a rejection of this offer in full.

3. This offer of judgment is inclusive of all claims, in any combination, that Plaintiffs

have or may have against all defendants, in any combination, including but not limited to DEFENDANT CITY, CHICAGO POLICE OFFICERS JUAN L. PEREZ (#19056), MATTHEW SANCHEZ (#10159), RICCARDO PEREZ GUZMAN (#18960), BRIAN BONE (#118378), JONATHAN DIAZ (#116858), ANDREW RANGEL (#121590), RIGOBERTO FINE (#117547), SGT. RICKY RIVERA (#2101), CHRISTIAN SZCZUR (#18774), and PIERRE TYLER (#10228), and any other current or former employees or agents of the City of Chicago, arising from or related to the incident or injuries alleged, or that could have been alleged, in Plaintiffs' Amended Complaint (Docket #26) or any amendment thereof.

4. This offer of judgment is conditioned upon plaintiffs accepting the offer of judgment against all Defendants, which will be payable solely by DEFENDANT CITY, and it is further contingent on Plaintiffs not further pursuing claims against DEFENDANT CITY, CHICAGO POLICE OFFICERS JUAN L. PEREZ (#19056), MATTHEW SANCHEZ (#10159), RICCARDO PEREZ GUZMAN (#18960), BRIAN BONE (#118378), JONATHAN DIAZ (#116858), ANDREW RANGEL (#121590), RIGOBERTO FINE (#117547), SGT. RICKY RIVERA (#2101), CHRISTIAN SZCZUR (#18774), and PIERRE TYLER (#10228), and any other current or former employees or agents of DEFENDANT CITY arising from or related to the incident or injuries alleged in Plaintiffs' Amended Complaint (Docket #26) or any amendment thereof. Acceptance of this offer of judgment will act to release and discharge DEFENDANT CITY, CHICAGO POLICE OFFICERS JUAN L. PEREZ (#19056), MATTHEW SANCHEZ (#10159), RICCARDO PEREZ GUZMAN (#18960), BRIAN BONE (#118378), JONATHAN DIAZ (#116858), ANDREW RANGEL (#121590), RIGOBERTO FINE (#117547), SGT. RICKY RIVERA (#2101), CHRISTIAN SZCZUR (#18774), and PIERRE TYLER (#10228), and any other current or former employees or agents of DEFENDANT CITY; their successors or assigns;

and all past and present officials, employees, representatives and agents of DEFENDANT CITY, or any agency thereof, from any and all claims that were or could have been alleged by Plaintiffs in their complaints or any amendment thereof.

5. Nothing in this offer of judgment should be construed as an admission by DEFENDANT CITY that any defendant, official, or employee was acting within the scope of their employment or that DEFENDANT CITY has agreed to, or is required to, indemnify any such person.

6. It is an express condition of this offer that Plaintiffs will not seek payment on this offer of judgment by anyone except the CITY OF CHICAGO, pursuant to the Tort Immunity Act, 745 ILCS 10/9-102, and that Plaintiffs will file a fully executed Satisfaction of Judgment once full payment is received from the City.

7. This offer of judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability or wrongdoing by any defendants, or any official, employee or agent of DEFENDANT CITY, or any agency thereof; nor is it an admission that Plaintiffs have suffered any damages.

8. It is an express condition of this offer that any prejudgment interest awarded to Plaintiffs by the Court does not begin to accrue until the 60th day following the acceptance of this offer.

9. It is an express condition of this offer that Plaintiffs will be paid sixty (60) days after the judgment is entered by the Court, and is payable by the CITY OF CHICAGO only.

10. Pursuant to Rule 68, an offer not accepted within fourteen (14) days after service thereof shall be deemed withdrawn and evidence of the offer of judgment is not admissible except in a proceeding to determine costs.

**Dated: June 17, 2022**

Respectfully submitted,

DEFENDANT, CITY OF CHICAGO

BY: /s/ Allen Wall  
Defendant's Attorney  
Special Assistant Corporation Counsel

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DEFENDANTS, CHICAGO POLICE OFFICERS

BY: /s/Larry S. Kowalczyk  
One of Defendant Officers' Attorneys  
Special Assistant Corporation Counsel

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*Counsel for Defendant Officers*

**CERTIFICATE OF SERVICE**

I, Megan K. Monaghan, an attorney, hereby certify that on June 17, 2022, I caused to be served the foregoing **Offer of Judgment** by electronic mail and hand delivery to the individuals listed below at the addresses listed below.

By: /s/Megan K. Monaghan  
Megan K. Monaghan

**Attorneys for Plaintiffs**

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